

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**THE CITY OF HUNTINGTON,
Plaintiff,**

**v.
AMERISOURCEBERGEN DRUG
CORPORATION, et al.,
Defendants.**

CIVIL ACTION NO. 3:17-01362

**CABELL COUNTY COMMISSION,
Plaintiff,**

**v.
AMERISOURCEBERGEN DRUG
CORPORATION, et al.,
Defendants.**

CIVIL ACTION NO. 3:17-01665

***FIRST NOTICE OF DEPOSITION OF
McKESSON CORPORATION***

Please take notice that the Plaintiffs hereby notice the deposition of McKesson Corporation in accordance with Rule 30(b)(6) of the Federal Rules of Civil Procedure on the following subject matters:

1. Validation and authentication of your CT2 transactional data and CT2 ARCOS data, including CT2_ARCOS_0000001 and CT2_ARCOS_0000002;
2. The operation of your suspicious order monitoring system (SOMS) regarding orders of prescription opioids arising out of the CT2 jurisdictions, including the setting of thresholds;
3. Each suspicious order your SOMS detected arising out of the CT2 jurisdictions;
4. Each suspicious order you reported to the DEA arising out of the CT2 jurisdictions;
5. Each suspicious order you reduced and/or cut to a lower amount and thereafter distributed into the CT2 jurisdictions;
6. Each order arising out of the CT2 jurisdictions that you cancelled and/or blocked as suspicious, including whether you reported the same to the DEA as suspicious;

7. Each order arising out of the CT2 jurisdictions that you identified as an order of interest and/or a suspicious order that you filled;
8. Each order that exceeded the thresholds in your SOMS that you filled;
9. Validation and authentication of the complete due diligence file for each of your customers you sold prescription opioids to in the CT2 jurisdictions; and
10. Any audit, investigation and/or review related to the sale of prescription opioids into the CT2 jurisdictions.

This deposition shall take place at a location and on a date mutually agreeable by the parties but no later than the close of fact discovery. If you object to producing a witness, or object to the specificity of the subject matters, please do so immediately to avoid delay. In lieu of producing a witness for deposition, Plaintiffs will accept a binding stipulation that you will produce a live witness(es) on these subject matters at trial.

Respectfully submitted,

THE CITY OF HUNTINGTON

/s/ Anne McGinness Kearse

Anne McGinness Kearse (WVSB No. 12547)

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CABELL COUNTY COMMISSION

/s/ Paul T. Farrell, Jr.

Paul T. Farrell, Jr. (WVSB No. 7443)

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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2020, a copy of the **FIRST NOTICE OF DEPOSITION OF McKESSON CORPORATION** was served using the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Paul T. Farrell, Jr.

Paul T. Farrell, Jr., Esq. (W.Va. Bar No. 7443)

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